

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

IN RE:

Michelle Denise McWilliams

CHAPTER 13

Debtor,

CASE NO. 16-31377

OBJECTION TO TRUSTEE'S MOTION TO DISMISS

COME NOW the Debtor, Michelle Denise McWilliams by and through his attorney, and hereby objects to Trustee's Motion to Dismiss, and as grounds will state as follows:

1. On the 27th day of May 2016, the Debtor filed a Chapter 13 petition in the United States Bankruptcy Court for the Middle District of Alabama, Northern Division.
2. Debtor got behind on plan payments due to an unexpected illness which caused a drop in household income.
3. Debtor resumed payments on May 26, 2021 in the amount of \$50.00 which has been uploaded to Chapter 13 doc system.

WHEREFORE, these premises considered, debtor prays for this court to deny Trustee's Motion to Dismiss in favor of Debtor and allow Debtor to continue in the case.

Done this 26th Day of May, 2021.

/s/ Charles E. Grainger, Jr.

Charles E. Grainger, Jr. ASB-6564-G26C
Attorney for the Debtor

CERTIFICATE OF SERVICE

I, Charles E. Grainger, Jr. hereby certify that I have served a copy of the forgoing upon the following interested parties electronically or by placing a copy of the same in the United States Mail; postage prepaid and properly addressed this 27th day of May 2021.

Hon. Sabrina L. McKinney
Chapter 13 Trustee
Via Electronic Filing

Debtor

/s/ Charles E. Grainger, Jr.

Charles E. Grainger, Jr. ASB-6564-G26C

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